

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

**JURY TRIAL DEMANDED**

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF  
PLAINTIFF HEADWATER'S SUR-REPLY TO DEFENDANTS'  
MOTION TO DISMISS FOR LACK OF STANDING AND  
PLAINTIFF'S REPLY IN SUPPORT OF ITS CROSS-MOTION FOR PARTIAL  
SUMMARY JUDGMENT AS TO DEFENDANTS' STANDING DEFENSE**

I, Kristopher Davis, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff Headwater Research LLC's Sur-reply to Defendants' Motion to Dismiss for Lack of Standing and Plaintiff's Reply in Support of Its Cross-Motion for Partial Summary Judgment as to Defendants' Standing Defense. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Exhibits A through BB were previously submitted with Headwater's opposition to Samsung's motion to dismiss and Headwater's cross-motion for summary judgment, filed on July 28, 2025. *See* Dkt. 169, 170.

3. Attached as **Exhibit CC** is a true and correct copy of the Deposition Transcript of Gregory Raleigh, dated May 23, 2025.

4. Attached as **Exhibit DD** is a true and correct copy of excerpts from the Deposition Transcript of Jeffrey Green, dated February 22, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 11, 2025, at Marshall, Texas.

/s/ Kristopher Davis  
Kristopher Davis